

EXHIBIT 1

CHEVRON CORPORATION V. STEVEN DONZIGER, et al.

Summary of Donziger-Related Bank Accounts**Exhibit 1**

Time Period: August 31, 2005 through June 30, 2018

#	Institution	Name on Account	Personal or Business	Account Type	Short Account #	Short Account Name	Activity Dates		Last Known Status	In SRD Stmt.?
							First	Last		
CHASE BANK ACCOUNTS										
1	Chase	Steven R. Donziger	Personal	Select Checking W/Interest	**5365	Personal Checking 5365	8/31/05	12/13/12	Closed	N/A
2	Chase	Steven R. Donziger Atty at Law	Business	Business Classic	**0218	Law Firm Checking 0218	3/23/07	1/7/13	Closed	N/A
3	Chase	Steven R. Donziger Atty at Law	Business	IOLTA Account	**9822	DeLeon IOLA Trust Account 9822	3/28/07	5/31/12	Closed	N/A
4	Chase	Steven R. Donziger	Personal	Private Client Checking	**5678	Personal Checking 5678	10/11/07	9/4/12	Closed	N/A
5	Chase	Steven R. Donziger Atty at Law	Business	Business Classic W/Interest	**2758	Ecuador Case Account 2758	2/17/10	5/4/12	Closed	N/A
6	Chase	Steven R. Donziger Atty at Law	Business	IOLTA Trust Account 2	**0989	IOLA Trust Account 2 0989	10/1/10	5/4/12	Closed	N/A
7	Chase	Steven R. Donziger	Personal	Private Client Savings	**9890	Personal Savings 9890	9/5/12	12/14/12	Closed	N/A
Total Chase Accounts: 7 (3 personal, 4 business)										
TD BANK ACCOUNTS										
8	TD Bank	Steven R. Donziger	Personal	Relationship Checking	**2265	Personal Checking 2265	12/3/12	12/27/16	Closed	No
9	TD Bank	Steven R. Donziger	Personal	Relationship Savings	**2388	Personal Savings 2388	12/3/12	7/9/14	Closed	No
10	TD Bank	Donziger and Associates PLLC	Business	Business Premier Checking	**8783	Law Firm Checking 8783	5/7/13	6/30/18	Open	Yes
11	TD Bank	Steven R. Donziger	Personal	Relationship Savings	**6418	Personal Savings 6418	6/25/16	4/23/18	Closed	No
12	TD Bank	Steven R. Donziger	Personal	Relationship Checking	**3420	Personal Checking 3420	11/14/16	6/25/18	Open	Yes
13	TD Bank	Steven R. Donziger	Personal	Select Savings	**9857	Personal Savings 9857	4/19/17	6/30/18	Open	Yes
14	TD Bank	Steven R. Donziger	Personal	Premier Checking	**8132	Personal Checking 8132	5/7/18	7/5/18	Open	Yes
15	TD Bank	Steven R. Donziger	Business	Business Convenience Plus	**8174	Law Firm Checking 8174	5/10/18	6/30/18	Open	Yes
Total TD Bank Accounts: 8 (6 personal, 2 business)										
OTHER BANK ACCOUNTS										
16	Bank of America	Streamline Family Office Inc. DBA CWP Associates	Business	Business Advantage Checking	**9158	CWP Checking 9158	12/22/17	5/3/18	Closed	N/A
17	BBVA Compass	Steven Donziger (P. Campbell Ford)	Not Noted	Build-to-Order Checking	**9997	BBVA Checking 9997	2/20/13	6/24/15	Closed	No

EXHIBIT 2

Chevron Corporation v. Steven Donziger, et al.

Investment Agreements Reviewed and Comparison with Known Investor Deposits into Donziger-Related Bank Accounts**Exhibit 2**

Time Period: May 2016 through January 2018

Invstr. #	Investor	Date of Agreement	Execution Status [1]	Equity Interest [1]	Lenczner Slaght Role(s) [1]	Agreement		[2] Remained w/ Lenczner Slaght	Deposit into Donziger or Other Account				
						Amount	After Fees		Amount	Date	Bank	Account Name	Acct. #
LENCZNER SLAGHT ROYCE SMITH ("LENCZNER SLAGHT") RELATED INVESTORS													
I	Glenn Krevlin	5/2/16	Partial	0.125%	Party	\$ 250,000.00	\$ 250,000.00	\$ 175,000.00	\$ 74,990.00	5/10/16	TD	Donziger & Associates	**8783
I	Glenn Krevlin	7/11/16	Partial	0.050%	Party	\$ 100,000.00	\$ 100,000.00	\$ 100,000.00	\$ -				
II	Cliff Eisler	7/11/16	Full	0.125%	Party and Escrow Agent	\$ 250,000.00	\$ 250,000.00	\$ 145,000.00	\$ 104,990.00	7/19/16	TD	Donziger & Associates	**8783
III	WDIS Finance LLC (John van Merkensteijn)	8/24/16	Full	0.165%	Party and Escrow Agent	\$ 300,000.00	\$ 285,000.00	\$ 141,500.00	\$ 143,490.00	10/6/16	TD	Donziger & Associates	**8783
IV	Wellbeck Partners (Jay L. Goldstein)	8/24/16	Full	0.110%	Party and Escrow Agent	\$ 200,000.00	\$ 200,000.00	\$ 100,000.00	\$ 99,990.00	10/21/16	TD	Donziger & Associates	**8783
III	WDIS Finance LLC (John van Merkensteijn)	11/10/16	Full	0.055%	Party and Escrow Agent	\$ 100,000.00	\$ 95,000.00	\$ 30,000.00	\$ 64,990.00	12/19/16	TD	Donziger & Associates	**8783
V	Indigenous People Limited [2]	11/24/16	Full	0.1375%	Party and Escrow Agent	\$ 250,000.00	\$ 237,500.00	\$ 100,000.00	\$ 137,490.00	2/21/17	TD	Donziger & Associates	**8783
LENCZNER SLAGHT-RELATED TOTALS						\$ 1,450,000.00	\$ 1,417,500.00	\$ 791,500.00	\$ 625,940.00				
OTHER INVESTORS / INVESTMENTS													
FENWICK (GEORGE R. WATERS) RELATED													
VI	Fenwick (George R. Waters)	1/22/16	Full	None	N/A	\$ 102,000.00	\$ 100,000.00	N/A	\$ 50,000.00	1/25/16	TD	Steven R. Donziger	**2265
VI	Fenwick (George R. Waters)	2/3/17	Full	0.076%	N/A	\$ 50,000.00	\$ 50,000.00	N/A	\$ 50,000.00	2/14/17	TD	Donziger & Associates	**8783
VI	Fenwick (George R. Waters)	12/17/17	Not Exec't'd	0.025%	N/A	\$ 50,000.00	\$ 50,000.00	N/A	\$ 50,000.00	12/11/17	TD	Donziger & Associates	**8783
FENWICK (GEORGE R. WATERS) TOTALS						\$ 202,000.00	\$ 200,000.00		\$ 150,000.00				
OTHER INVESTMENTS DEPOSITED WITH STREAMLINE FAMILY OFFICE INC DBA CWP ASSOCIATES ("CWP ASSOCIATES")													
VII	CHV LLC / Tony Abbiati & Client (appears to be James McCaffrey)	12/20/17	Full	0.250%	N/A	\$ 500,000.00	\$ 500,000.00	N/A	\$ 250,000.00	1/2/18	Bank of America	CWP Associates	**9158
									\$ 250,000.00	1/5/18	Bank of America	CWP Associates	**9158
I	Glenn Krevlin	1/2/18	Partial	0.16675%	N/A	\$ 250,000.00	\$ 250,000.00	N/A	\$ 250,000.00	1/18/18	Bank of America	CWP Associates	**9158
DEPOSITED WITH CWP ASSOCIATES TOTALS						\$ 750,000.00	\$ 750,000.00		\$ 750,000.00				
GRAND TOTALS						\$ 2,402,000.00	\$ 2,367,500.00	\$ 791,500.00	\$ 1,525,940.00				

Notes:

[1] In addition to Agreements, Kroll identified the "Execution Status," "Equity Interest", and "Lenczner Slaght Role(s)" based on documents provided in the Mary Katherine Sullivan productions.

[2] Per **JVM 002466**, Lenczner Slaght has retained \$691,500 of the \$1,417,500 it has received to satisfy outstanding legal fees. The \$100,000 difference is likely due to the timing of the Indigenous People Ltd. Agreement transactions.

JVM 002466 was dated February 2, 2017, prior to the February 21, 2017 payment into the Donziger & Associate's TD Bank account.

It also identifies the \$237,500.00 After-Fees amount for the Indigenous People Ltd. Agreement as "Available Cash" in the Lenczner Slaght Escrow Account.

EXHIBIT 3-A

Chevron Corporation v. Steven Donziger, et al.

Detail of Investor Deposits Into Donziger-Controlled Bank Accounts (by Individual Deposits)**Exhibit 3-A****Time Period: January 1, 2016 through June 30, 2018**

#	Tx Date	Investor	To	Bank	Account #	Type	Trans.	Amount
PAID DIRECTLY TO DONZIGER								
1	1/25/16	George R Waters	Steven R. Donziger	TD Bank	**2265	Pers. Chkg.	Wire	\$ 50,000.00
2	2/14/17	George R Waters	Donziger & Associates	TD Bank	**8783	Bus. Chkg.	Wire	50,000.00
3	12/11/17	George R Waters	Donziger & Associates	TD Bank	**8783	Bus. Chkg.	Wire	50,000.00
SUBTOTAL DIRECT TO DONZIGER								\$ 150,000.00
PAID TO DONZIGER THROUGH LENCZNER SLAGHT ROYCE SMITH [1]								
4	5/10/16	Glenn Krevlin	Donziger & Associates	TD Bank	**8783	Bus. Chkg.	Wire	74,990.00
5	7/19/16	Cliff Eisler	Donziger & Associates	TD Bank	**8783	Bus. Chkg.	Wire	104,990.00
6	10/6/16	JV Merkensteijn (WDIS)	Donziger & Associates	TD Bank	**8783	Bus. Chkg.	Wire	143,490.00
7	10/21/16	Wellbeck Partners	Donziger & Associates	TD Bank	**8783	Bus. Chkg.	Wire	99,990.00
8	12/19/16	JV Merkensteijn (WDIS)	Donziger & Associates	TD Bank	**8783	Bus. Chkg.	Wire	64,990.00
9	2/21/17	Ian Watson	Donziger & Associates	TD Bank	**8783	Bus. Chkg.	Wire	137,490.00
SUBTOTAL TO DONZIGER THROUGH LENCZNER SLAGHT ROYCE SMITH								\$ 625,940.00
PAID TO DONZIGER THROUGH CWP ASSOCIATES AND FORUM NOBIS								
10	1/30/18	CWP Associates	Donziger & Associates	TD Bank	**8783	Bus. Chkg.	Wire	25,000.00
11	2/5/18	CWP Associates	Donziger & Associates	TD Bank	**8783	Bus. Chkg.	Wire	25,000.00
12	3/13/18	CWP Associates	Donziger & Associates	TD Bank	**8783	Bus. Chkg.	Wire	75,000.00
13	5/8/18	Forum Nobis	Steven R. Donziger	TD Bank	**8132	Pers. Chkg.	Wire	342,045.16
DIRECT TO DONZIGER FROM CWP AND FORUM NOBIS								\$ 467,045.16
TOTAL INVESTOR PAYMENTS TO DONZIGER TD BANK ACCOUNTS								\$ 1,242,985.16
INVESTOR PAYMENTS THAT INITIALLY WENT TO CWP ASSOCIATES [2]								
1/2/18	Antony Abbiati	CWP Associates	BofA	**9158	Bus. Chkg.	Wire	250,000.00	
1/5/18	James McCaffrey	CWP Associates	BofA	**9158	Bus. Chkg.	Wire	250,000.00	
1/18/18	Glenn J. Krevlin	CWP Associates	BofA	**9158	Bus. Chkg.	Wire	250,000.00	
SUBTOTAL INDIRECT TO DONZIGER								\$ 750,000.00
TOTAL INVESTOR PAYMENTS								\$ 1,525,940.00

ANALYSES

Subtotal Direct from Investors to Donziger Accounts	\$ 150,000.00
Subtotal From Lenczner Slaght to Donziger Accounts	625,940.00
Three Direct Transfers from CWP to Donziger Accounts	125,000.00
One to Donziger Accounts via Forum Nobis	342,045.16
Total Investor Amounts to Donziger Accounts	\$ 1,242,985.16
Deposits from Other External Sources 1/1/16 - 6/30/18	72,988.15
Total Deposits to Donziger Accounts 1/1/16 - 6/30/18	\$ 1,315,973.31
Percentage of Investor Deposits to Total Deposits	94.5%

Note [1]: As shown on **Exhibit 1**, five payments in 2016 and one in 2017 were paid through Lenczner Slaght Royce Smith.

Note [2]: Abbiati / McCaffrey / Krevlin Total to CWP Associates	\$ 750,000.00
Disbursed as follows:	
CWP Payments on behalf of Donziger	(282,954.84)
Three Direct Transfers to Donziger	(125,000.00)
One to Donziger via Forum Nobis	(342,045.16)
TOTAL	\$ -

EXHIBIT 3-B

Detail of Investor Deposits Into Donziger-controlled Bank Accounts (by Year and Investor)**Exhibit 3-B****Time Period: August 2004 through January 2018****ANNUAL SUMMARY**

Year	# of Deposits	Total Amount
2004	5	\$ 92,874.35
2005	18	165,621.34
2006	16	207,312.96
2007	10	1,999,911.36
2008	10	233,110.83
2009	10	217,414.62
2010	5	2,550,000.00
2011	7	1,179,486.18
2012	4	789,000.00
2013	4	447,000.00
2014	0	-
2015	0	-
2016	8	538,450.00
2017	3	237,490.00
2018	3	750,000.00
Total 2016-2018	14	\$ 1,525,940.00
Total 2004-2018	103	\$ 9,407,671.64

SUMMARY BY INVESTOR

Investor	Amount
Magister Law	\$ 3,274,486.18
Russ DeLeon	1,750,000.00
Kohn, Swift & Graf	1,166,245.46
Torvia	714,000.00
Patton Boggs, LLP	430,000.00
Glenn J. Krevlin	324,990.00
Antony Abbiati	250,000.00
James McCaffrey	250,000.00
WDIS Finance (JV Merkensteijn)	208,480.00
George R Waters	202,000.00
Olswang LLP (Woodsford)	200,000.00
Orin Kramer	150,000.00
Indigenous People Ltd (Ian Watson)	137,490.00
Cliff Eisler	104,990.00
Michael Donziger	100,000.00
Wellbeck Partners (Jay Goldstein)	99,990.00
Amazonia Recovery Limited	45,000.00
Totals	\$ 9,407,671.64

#	Bank Name	Name on Account	Account #	Tx Date	Transaction Type	From	To	Amount
1	Chase	Steven R. Donziger	61-65	8/16/2004	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	\$ 31,397.37
2	Chase	Steven R. Donziger	61-65	10/18/2004	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
3	Chase	Steven R. Donziger	61-65	11/8/2004	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	12,692.39
4	Chase	Steven R. Donziger	61-65	11/22/2004	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	30,000.00
5	Chase	Steven R. Donziger	61-65	11/24/2004	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	3,784.59
Subtotal - 2004								\$ 92,874.35
6	Chase	Steven R. Donziger	52-65	1/19/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	27,000.00
7	Chase	Steven R. Donziger	52-65	2/3/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	2,818.21
8	Chase	Steven R. Donziger	52-65	2/16/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	3,879.95
9	Chase	Steven R. Donziger	52-65	2/16/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
10	Chase	Steven R. Donziger	52-65	2/18/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	488.70
11	Chase	Steven R. Donziger	52-65	4/14/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	1,240.00
12	Chase	Steven R. Donziger	52-65	4/14/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	4,216.98
13	Chase	Steven R. Donziger	52-65	4/14/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	5,685.30
14	Chase	Steven R. Donziger	52-65	4/14/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
15	Chase	Steven R. Donziger	52-65	6/23/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	910.60
16	Chase	Steven R. Donziger	52-65	6/23/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	3,393.06

Detail of Investor Deposits Into Donziger-controlled Bank Accounts (by Year and Investor)**Exhibit 3-B****Time Period: August 2004 through January 2018**

#	Bank Name	Name on Account	Account #	Tx Date	Transaction Type	From	To	Amount
17	Chase	Steven R. Donziger	52-65	7/18/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	6,478.58
18	Chase	Steven R. Donziger	52-65	7/21/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
19	Chase	Steven R. Donziger	52-65	7/21/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
20	Chase	Steven R. Donziger	52-65	7/21/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
21	Chase	Steven R. Donziger	52-65	8/29/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	4,509.96
22	Chase	Steven R. Donziger	5365	12/1/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
23	Chase	Steven R. Donziger	5365	12/19/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
Subtotal - 2005								\$ 165,621.34
24	Chase	Steven R. Donziger	5365	2/1/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	1,952.01
25	Chase	Steven R. Donziger	5365	2/1/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	6,026.37
26	Chase	Steven R. Donziger	5365	2/6/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	2,572.39
27	Chase	Steven R. Donziger	5365	4/11/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	468.39
28	Chase	Steven R. Donziger	5365	4/11/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	2,093.37
29	Chase	Steven R. Donziger	5365	4/11/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	3,287.28
30	Chase	Steven R. Donziger	5365	4/11/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	5,162.87
31	Chase	Steven R. Donziger	5365	4/11/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
32	Chase	Steven R. Donziger	5365	6/8/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	1,453.67
33	Chase	Steven R. Donziger	5365	6/8/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	3,651.98
34	Chase	Steven R. Donziger	5365	6/14/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	2,360.32
35	Chase	Steven R. Donziger	5365	6/14/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	5,367.24
36	Chase	Steven R. Donziger	5365	6/14/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	40,000.00
37	Chase	Steven R. Donziger	5365	8/28/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	7,156.46
38	Chase	Steven R. Donziger	5365	9/1/2006	Check deposit	Kohn, Swift & Graf	Steven R. Donziger	45,000.00
39	Chase	Steven R. Donziger	5365	11/30/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	65,760.61
Subtotal - 2006								\$ 207,312.96
40	Chase	Steven R. Donziger	5365	2/26/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	9,284.09
41	Chase	Donziger & Associates	0218	3/23/2007	Wire Transfer	Russ DeLeon	Donziger & Associates	1,750,000.00
42	Chase	Steven R. Donziger	5365	5/18/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	13,629.31
43	Chase	Steven R. Donziger	5365	5/18/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
44	Chase	Steven R. Donziger	5365	5/18/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	90,000.00
45	Chase	Steven R. Donziger	5365	7/18/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	20,187.72
46	Chase	Steven R. Donziger	5365	8/13/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	30,000.00
47	Chase	Steven R. Donziger	5365	9/13/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	13,340.47
48	Chase	Steven R. Donziger	5365	10/22/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	30,000.00
49	Chase	Steven R. Donziger	5365	11/5/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	28,469.77
Subtotal - 2007								\$ 1,999,911.36

Detail of Investor Deposits Into Donziger-controlled Bank Accounts (by Year and Investor)**Exhibit 3-B****Time Period: August 2004 through January 2018**

#	Bank Name	Name on Account	Account #	Tx Date	Transaction Type	From	To	Amount
50	Chase	Steven R. Donziger	5365	5/21/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	10,489.30
51	Chase	Steven R. Donziger	5365	5/21/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	45,000.00
52	Chase	Steven R. Donziger	5365	7/14/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	30,000.00
53	Chase	Steven R. Donziger	5365	8/5/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	24,004.50
54	Chase	Steven R. Donziger	5365	9/9/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	5,147.93
55	Chase	Donziger & Assoc.	0218	9/29/2008	Check Deposit	Kohn, Swift & Graf	Donziger & Associates	45,000.00
56	Chase	Steven R. Donziger	5365	10/28/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	14,313.25
57	Chase	Steven R. Donziger	5365	12/17/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	7,407.13
58	Chase	Steven R. Donziger	5365	12/17/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	9,248.72
59	Chase	Steven R. Donziger	5365	12/17/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	42,500.00
Subtotal - 2008								\$ 233,110.83
60	Chase	Steven R. Donziger	5365	3/2/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	8,351.15
61	Chase	Steven R. Donziger	5365	3/2/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,713.54
62	Chase	Steven R. Donziger	5365	4/7/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	30,000.00
63	Chase	Steven R. Donziger	5365	5/12/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	18,363.28
64	Chase	Steven R. Donziger	5365	5/12/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	30,000.00
65	Chase	Steven R. Donziger	5365	7/20/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	44,986.65
66	Chase	Steven R. Donziger	5365	7/27/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	30,000.00
67	Chase	Steven R. Donziger	5365	8/19/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	5,000.00
68	Chase	Steven R. Donziger	5365	8/19/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	17,500.00
69	Chase	Steven R. Donziger	5365	10/9/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	17,500.00
Subtotal - 2009								\$ 217,414.62
70	Chase	Donziger & Assoc.	0218	2/17/2010	Transfer	Orin Kramer	Donziger & Associates	150,000.00
71	Chase	Donziger & Assoc.	0218	3/10/2010	Transfer	Magister Law	Donziger & Associates	500,000.00
72	Chase	Donziger & Assoc.	0218	6/11/2010	Transfer	Magister Law	Donziger & Associates	250,000.00
73	Chase	Donziger & Assoc.	0218	8/17/2010	Transfer	Magister Law	Donziger & Associates	1,250,000.00
74	Chase	Donziger & Assoc.	0218	12/31/2010	Transfer	Patton Boggs, LLP	Donziger & Associates	400,000.00
Subtotal - 2010								\$ 2,550,000.00
75	Chase	Donziger & Assoc.	0218	2/24/2011	Deposit	Michael Donziger	Donziger & Associates	100,000.00
76	Chase	Donziger & Assoc.	0218	3/18/2011	Transfer	Patton Boggs, LLP	Donziger & Associates	30,000.00
77	Chase	Donziger & Assoc.	0218	6/16/2011	Transfer	Magister Law	Donziger & Associates	307,469.57
78	Chase	Donziger & Assoc.	0218	7/1/2011	Transfer	Magister Law	Donziger & Associates	115,000.00
79	Chase	Donziger & Assoc.	0218	8/19/2011	Transfer	Magister Law	Donziger & Associates	350,000.00
80	Chase	Donziger & Assoc.	0218	9/26/2011	Transfer	Magister Law	Donziger & Associates	27,016.61
81	Chase	Donziger & Assoc.	0218	11/15/2011	Transfer	Magister Law	Donziger & Associates	250,000.00
Subtotal - 2011								\$ 1,179,486.18

Detail of Investor Deposits Into Donziger-controlled Bank Accounts (by Year and Investor)**Exhibit 3-B****Time Period: August 2004 through January 2018**

#	Bank Name	Name on Account	Account #	Tx Date	Transaction Type	From	To	Amount
82	Chase	Donziger & Assoc.	0218	2/2/2012	Transfer	Magister Law	Donziger & Associates	225,000.00
83	Chase	Donziger & Assoc.	0218	5/18/2012	Transfer	Torvia	Donziger & Associates	380,000.00
84	Chase	Donziger & Assoc.	0218	11/23/2012	Deposit	Torvia	Donziger & Associates	180,000.00
85	Chase	Donziger & Assoc.	0218	11/23/2012	Deposit	Torvia	Donziger & Associates	4,000.00
Subtotal - 2012								\$ 789,000.00
86	TD Bank	Steven R. Donziger	427-7302265	2/25/2013	Wire Transfer	Torvia	Steven R. Donziger	150,000.00
87	TD Bank	Steven R. Donziger	427-7302265	4/4/2013	Wire Transfer	Amazonia Recovery Limited	Steven R. Donziger	45,000.00
88	TD Bank	Steven R. Donziger	427-7302265	10/10/2013	Wire Transfer	Olswang LLP (Woodsford)	Steven R. Donziger	200,000.00
89	TD Bank	Steven R. Donziger	427-7302265	10/28/2013	Wire Transfer	George R Waters	Steven R. Donziger	52,000.00
Subtotal - 2013								\$ 447,000.00
Subtotal - 2014								\$ -
Subtotal - 2015								\$ -
92	TD Bank	Steven R. Donziger	427-7302265	1/25/2016	Wire Transfer	George R Waters	Steven R. Donziger	50,000.00
93	TD Bank	Donziger & Assoc.	427-3938783	5/10/2016	Wire Transfer	Glenn J. Krevlin [1]	Donziger & Associates	74,990.00
94	TD Bank	Donziger & Assoc.	427-3938783	7/19/2016	Wire Transfer	Cliff Eisler [1]	Donziger & Associates	104,990.00
95	TD Bank	Donziger & Assoc.	427-3938783	10/6/2016	Wire Transfer	JV Merkensteijn (WDIS) [1]	Donziger & Associates	143,490.00
96	TD Bank	Donziger & Assoc.	427-3938783	10/21/2016	Wire Transfer	Wellbeck Partners [1]	Donziger & Associates	99,990.00
97	TD Bank	Donziger & Assoc.	427-3938783	12/19/2016	Wire Transfer	JV Merkensteijn (WDIS) [1]	Donziger & Associates	64,990.00
Subtotal - 2016								\$ 538,450.00
98	TD Bank	Donziger & Assoc.	427-3938783	2/14/2017	Wire Transfer	George R Waters	Donziger & Associates	50,000.00
99	TD Bank	Donziger & Assoc.	427-3938783	2/21/2017	Wire Transfer	Ian Watson [1]	Donziger & Associates	137,490.00
100	TD Bank	Donziger & Assoc.	427-3938783	12/11/2017	Wire Transfer	George R Waters	Donziger & Associates	50,000.00
Subtotal - 2017								\$ 237,490.00
101	Bank of America	CWP Associates	466001799158	1/2/2018	Transfer	Antony Abbiati	CWP Associates	250,000.00
102	Bank of America	CWP Associates	466001799158	1/5/2018	Transfer	James McCaffrey	CWP Associates	250,000.00
103	Bank of America	CWP Associates	466001799158	1/18/2018	Transfer	Glenn J. Krevlin	CWP Associates	250,000.00
Subtotal - 2018								\$ 750,000.00
Total - 2004 through June 2018								\$ 9,407,671.64

Note [1]: Five payments in 2016 and one in 2017 were paid through Lenczner Slaght Royce Smith.

EXHIBIT 4-A

Chevron Corporation v. Steven Donziger, et al.

Analysis of TD Bank Accounts - Balances, Investor Deposits and Transfers Between Accounts**Exhibit 4-A****Time Period: January 1, 2016 through June 30, 2018**

Transfers between accounts				Investor deposit into a Personal account				Investor deposit into a Law Firm account								
Acct #:	**2265		**6418		**3420		**9857		**8132		**8783		**8174		TOTAL	
Name:	SRD Personal Checking Acct		SRD Personal Savings Acct		SRD Personal Checking Acct		SRD Personal Savings Acct		SRD Personal Checking Acct		Law Firm Checking Acct		Law Firm Checking Acct			
Month	Beg. Bal.	Avg. Bal.	Beg. Bal.	Avg. Bal.	Beg. Bal.	Avg. Bal.	Beg. Bal.	Avg. Bal.	Beg. Bal.	Avg. Bal.	Beg. Bal.	Avg. Bal.	Beg. Bal.	Avg. Bal.	Beg. Bal.	Avg. Bal.
Jan-16	8,975.88	52,876.65	262,968.14	244,514.09							5,208.32	5,208.32			277,152.34	302,599.06
1/13/16	12,000.00	←	(12,000.00)													
1/14/16	25,000.00	←	(25,000.00)													
1/25/16	50,000.00 Payment from George R Waters into Personal account - <u>none</u> transferred to a Law Firm account															
Feb-16	72,487.15	53,979.34	226,060.03	226,100.33							5,178.32	5,178.32			303,725.50	285,257.99
Mar-16	41,995.71	35,746.56	226,140.63	226,183.73							5,147.32	5,148.32			273,283.66	267,078.61
Apr-16	30,220.17	11,070.95	226,226.83	226,264.53							5,118.32	5,118.32			261,565.32	242,453.80
May-16	(962.38)	42,807.96	226,303.23	226,341.57							5,088.32	14,510.57			230,429.17	283,660.10
5/10/16	Payment from Lenczner Slaght Royce Smith deposited to Law Firm account										74,990.00 Three days later \$70,000 transferred to Personal					
5/13/16	70,000.00								←		(70,000.00)					
Jun-16	35,632.55	12,321.50	226,379.90	180,039.52							6,993.32	6,993.32			269,005.77	199,354.34
Jul-16	(2,220.45)	27,654.49	133,698.14	197,145.08							6,963.32	18,727.02			138,441.01	243,526.59
7/19/16	50,000.00	←	(50,000.00)													
7/19/16	Payment from Lenczner Slaght Royce Smith deposited to Law Firm account										104,990.00 Three days later \$100,000 transferred to Personal					
7/22/16			100,000.00						←		(100,000.00)					
Aug-16	26,229.53	17,739.19	260,592.01	214,073.11							11,908.32	8,298.32			298,729.86	240,110.62
Sep-16	13,123.17	40,208.92	167,554.20	142,584.83							8,298.32	8,124.98			188,975.69	190,918.73
9/19/16	50,000.00	←	(50,000.00)													
Oct-16	24,003.68	17,562.76	117,615.45	116,101.25							7,228.32	151,727.51			148,847.45	285,391.52
10/6/16	Payment from Lenczner Slaght Royce Smith deposited to Law Firm account										143,490.00					
10/21/16	Payment from Lenczner Slaght Royce Smith deposited to Law Firm account										99,990.00 Ten days later \$25,000 transferred to Personal					
10/31/16	25,000.00								←		(25,000.00)					
Nov-16	21,900.45	1,681.36	114,587.05	114,480.82	\$ -	\$ 21,354.87					200,248.32	192,330.89			336,735.82	329,847.94
11/14/16	(20,000.00)	→			20,000.00											
11/14/16	(1,897.73)	→			1,897.73											
Dec-16	226.04	211.91	114,374.58	114,393.96	20,652.86	20,872.42					189,034.85	165,437.17			324,288.33	300,915.46
12/19/16	Payment from Lenczner Slaght Royce Smith deposited to Law Firm account										64,990.00 Eight days later \$80,000 transferred to Personal					
12/27/16					80,000.00				←		(80,000.00)					
Jan-17			114,413.33	114,432.77	20,892.64	65,626.15					114,562.85	114,328.01			249,868.82	294,386.93
Feb-17			114,452.20	114,469.76	35,774.23	26,070.71					113,522.85	170,970.52			263,749.28	311,510.99

Chevron Corporation v. Steven Donziger, et al.

Analysis of TD Bank Accounts - Balances, Investor Deposits and Transfers Between Accounts**Exhibit 4-A****Time Period: January 1, 2016 through June 30, 2018**

		Transfers between accounts				Investor deposit into a Personal account				Investor deposit into a Law Firm account										
Acct #:	**2265		**6418		**3420		**9857		**8132		**8783		**8174		TOTAL					
Name:	SRD Personal Checking Acct		SRD Personal Savings Acct		SRD Personal Checking Acct		SRD Personal Savings Acct		SRD Personal Checking Acct		Law Firm Checking Acct		Law Firm Checking Acct							
Month	Beg. Bal.	Avg. Bal.	Beg. Bal.	Avg. Bal.	Beg. Bal.	Avg. Bal.	Beg. Bal.	Avg. Bal.	Beg. Bal.	Avg. Bal.	Beg. Bal.	Avg. Bal.	Beg. Bal.	Avg. Bal.	Beg. Bal.	Avg. Bal.				
2/14/17	Payment from George R Waters deposited to Law Firm account											50,000.00								
2/21/17	Payment from Lenczner Slaght Royce Smith deposited to Law Firm account											137,490.00 Over the next 6 months \$60,000 transferred to Personal								
Mar-17			114,487.32	94,743.44	19,999.40	13,033.77					285,917.85	268,490.36			420,404.57	376,267.57				
3/20/17					25,000.00					←	(25,000.00)									
Apr-17			74,999.56	37,507.18	27,870.21	19,943.23	-	37,505.95			250,472.11	244,593.33			353,341.88	339,549.69				
4/19/17			(74,999.56)	→			74,999.56													
May-17			14.80	14.80	12,109.76	9,362.26	75,011.89	75,027.82			232,594.65	216,343.09			319,731.10	300,747.97				
Jun-17			14.80	14.80	6,877.86	4,665.46	75,043.74	75,059.16			210,213.94	171,937.64			292,150.34	251,677.06				
6/27/17					10,000.00					←	(10,000.00)									
Jul-17			14.80	14.80	4,923.07	6,581.04	75,074.58	75,090.52			127,900.44	127,204.95			207,912.89	208,891.31				
Aug-17			14.81	14.81	515.36	8,550.54	75,106.46	75,122.41			126,360.44	78,367.38			201,997.07	162,055.14				
8/8/17					25,000.00					←	(25,000.00)									
Sep-17			14.81	14.81	12,689.04	10,434.58	75,138.36	62,651.78			63,326.70	39,070.61			151,168.91	112,171.78				
9/15/17					10,000.00	←	(10,000.00)													
9/22/17					15,000.00	←	(15,000.00)													
Oct-17			14.81	14.81	15,359.73	11,725.44	50,165.20	32,807.31			20,336.26	19,076.90			85,876.00	63,624.46				
Nov-17			14.81	14.81	4,422.91	4,018.77	15,449.41	12,944.08			17,866.26	17,024.52			37,753.39	34,002.18				
11/30/17					5,000.00	←	(5,000.00)													
Dec-17			14.81	14.81	3,798.36	10,816.94	10,438.74	10,431.68			11,523.26	33,154.38			25,775.17	54,417.81				
12/11/17					Payment from George R Waters deposited to Law Firm account											50,000.00 Over the next ~6 weeks \$45,000 transferred to Personal				
12/18/17					25,000.00					←	(25,000.00)									
Jan-18			14.81	14.81	19,777.44	14,325.47	10,424.62	10,417.57			35,438.26	29,792.13			65,655.13	54,549.98				
1/11/18					5,000.00					←	(5,000.00)									
1/24/18					15,000.00					←	(15,000.00)									
1/30/18					Payment from Streamline Family Office deposited to Law Firm account											25,000.00				
Feb-18			14.81	14.81	2,700.26	4,822.93	10,410.51	10,403.41			40,393.26	43,309.68			53,518.84	58,550.83				
2/5/18					Payment from Streamline Family Office deposited to Law Firm account											25,000.00 Over the next ~5 weeks \$20,000 transferred to Personal				
2/7/18					10,000.00					←	(10,000.00)									
Mar-18			14.81	14.81	5,532.38	7,401.79	10,396.31	10,279.91			44,708.26	55,169.16			60,651.76	72,865.67				
3/13/18					10,000.00					←	(10,000.00)									

Chevron Corporation v. Steven Donziger, et al.

Analysis of TD Bank Accounts - Balances, Investor Deposits and Transfers Between Accounts**Exhibit 4-A****Time Period: January 1, 2016 through June 30, 2018**

Transfers between accounts				Investor deposit into a Personal account				Investor deposit into a Law Firm account									
Acct #:	**2265		**6418		**3420		**9857		**8132		**8783		**8174		TOTAL		
Name:	SRD Personal Checking Acct		SRD Personal Savings Acct		SRD Personal Checking Acct		SRD Personal Savings Acct		SRD Personal Checking Acct		Law Firm Checking Acct		Law Firm Checking Acct				
Month	Beg. Bal.	Avg. Bal.	Beg. Bal.	Avg. Bal.	Beg. Bal.	Avg. Bal.	Beg. Bal.	Avg. Bal.	Beg. Bal.	Avg. Bal.	Beg. Bal.	Avg. Bal.	Beg. Bal.	Avg. Bal.	Beg. Bal.	Avg. Bal.	
3/13/18			Payment from Streamline Family Office deposited to Law Firm account 75,000.00 Over the next ~7 weeks \$45,000 transferred to Personal														
Apr-18			14.81	7.41	2,375.60	4,602.80	10,163.51	10,156.43			77,313.19	61,479.85			89,867.11	76,246.48	
4/12/18					10,000.00						(10,000.00)						
4/16/18					15,000.00						(15,000.00)						
4/25/18					10,000.00						(10,000.00)						
May-18			0.00		4,562.81	5,302.17	10,149.34	10,142.27	0.00	52,629.52	42,313.19	115,861.57	\$ -	101,187.86	57,025.34	285,123.39	
5/3/18					10,000.00						(10,000.00)						
5/8/18			Payment from Forum Nobis into Personal account \$342,045.16														
5/10/18									(342,045.16)				342,045.16				
5/10/18											125,000.00		(125,000.00)				
5/10/18									35,000.00					(35,000.00)			
5/14/18					10,000.00						(10,000.00)						
Jun-18					(604.51)	3,412.03	10,121.03	Redacted	33,142.65	Redacted	147,283.19	137,283.19	99,719.66	92,207.16	289,662.02	232,902.38	
6/4/18					10,000.00						(10,000.00)						
6/4/18					10,000.00		NO INVESTOR DEPOSITS				(10,000.00)						
Ending Balance at June 30, 2018			\$ -		\$ (104.45)		\$ 10,121.03		\$ 28,102.65		\$ 127,283.19		\$ 84,694.66		\$ 250,097.08		
							at 5/31/18				at 6/18/18				at 6/11/18		

Note:

The CWP / Forum Nobis to Donziger \$342,045.16 related transactions are outlined.

EXHIBIT 4-B

CHEVRON CORPORATION V. STEVEN DONZIGER, et al.

Detail of Specific Investor Deposits into SRD TD Bank Personal Accounts**Exhibit 4-B****Time Period: January 1, 2016 through June 30, 2018**

#	Trans. Date	Transaction Type	From	To	Amount
1	1/25/16	Deposit	George Waters	Pers. Chkg. **2265	50,000.00
2	5/13/16	Treasury In	Law Firm Chkg. 8783	Pers. Chkg. **2265	70,000.00
3	7/22/16	Treasury In	Law Firm Chkg. 8783	Pers. Svngs. **6418	100,000.00
4	10/31/16	Treasury In	Law Firm Chkg. 8783	Pers. Chkg. **2265	25,000.00
5	12/27/16	Treasury In	Law Firm Chkg. 8783	Pers. Chkg. **3420	80,000.00
6	3/20/17	Treasury In	Law Firm Chkg. 8783	Pers. Chkg. **3420	25,000.00
7	6/27/17	Treasury In	Law Firm Chkg. 8783	Pers. Chkg. **3420	10,000.00
8	8/8/17	Treasury In	Law Firm Chkg. 8783	Pers. Chkg. **3420	25,000.00
9	12/18/17	Treasury In	Law Firm Chkg. 8783	Pers. Chkg. **3420	25,000.00
10	1/11/18	Treasury In	Law Firm Chkg. 8783	Pers. Chkg. **3420	5,000.00
11	1/24/18	Treasury In	Law Firm Chkg. 8783	Pers. Chkg. **3420	15,000.00
12	2/7/18	Treasury In	Law Firm Chkg. 8783	Pers. Chkg. **3420	10,000.00
13	3/13/18	Treasury In	Law Firm Chkg. 8783	Pers. Chkg. **3420	10,000.00
14	4/12/18	Treasury In	Law Firm Chkg. 8783	Pers. Chkg. **3420	10,000.00
15	4/16/18	Treasury In	Law Firm Chkg. 8783	Pers. Chkg. **3420	15,000.00
16	4/25/18	Treasury In	Law Firm Chkg. 8783	Pers. Chkg. **3420	10,000.00
17	5/3/18	Treasury In	Law Firm Chkg. 8783	Pers. Chkg. **3420	10,000.00
18	5/8/18	Deposit	Forum Nobis	Pers. Chkg. **8132	342,045.16
19	5/10/18	Treasury Out	Pers. Chkg. 8132	Law Firm Chkg. **8174	(342,045.16)
20	5/10/18	Treasury In	Law Firm Chkg. 8174	Pers. Chkg. **8132	35,000.00
21	5/14/18	Treasury In	Law Firm Chkg. 8783	Pers. Chkg. **3420	10,000.00
22	6/4/18	Treasury In	Law Firm Chkg. 8783	Pers. Chkg. **3420	10,000.00
23	6/4/18	Treasury In	Law Firm Chkg. 8783	Pers. Chkg. **3420	10,000.00
Total Investor Deposits made to SRD Personal Accounts [1] [2]:					\$50,000.00
Net Transfers from Law Firm accounts to SRD Personal Accounts					\$510,000.00
Sum of Law Firm funds and Investor Deposits appropriated to Personal Accounts					\$560,000.00
Plus: Total Beg. Balance and Other External Deposits into SRD Personal Accounts					\$340,431.17
Equals: Total Available Cash in SRD Personal Accounts 1/1/16 - 6/30/18					\$900,431.17
Total Payments made from SRD Personal Accounts					(\$862,401.94)

[1] All CWP Payments were made to Law Firm Checking Account **8783.**[2]** Items #18 and #19 are excluded from the Total Investor Deposits to SRD Personal Accounts calculation as it was immediately transferred to a Law Firm Account in its entirety.

EXHIBIT 4-C

Analysis of Chase Bank Accounts - Transfers Between Accounts

Exhibit 4-C

Time Period: January 2010 through January 2013

See Summary on page 3.

#	Date	SRD Personal Checking Acct **5365	SRD Personal Savings Acct **5678	SRD Personal Savings Acct **9890	Law Firm Account **0218	Ecuador Case Account **2758	DeLeon IOLA Trust Account **9822	IOLA Trust Account 2 **0989	Total
1	1/22/10		(10,000.00)		10,000.00				\$ -
2	2/4/10		(10,000.00)		10,000.00				-
3	2/17/10				(150,000.00)	150,000.00			-
4	2/17/10	30,000.00	(30,000.00)						-
5	2/17/10		(10,000.00)		10,000.00				-
6	2/18/10	300.00	(300.00)						-
7	2/22/10	300.00	(300.00)						-
8	2/26/10	300.00	(300.00)						-
9	3/1/10	50.00	(50.00)						-
10	3/2/10	300.00	(300.00)						-
11	3/5/10	6,400.00	(6,400.00)						-
12	3/10/10	20,000.00	(20,000.00)						-
13	3/12/10				(500,000.00)	500,000.00			-
14	3/16/10				10,000.00	(10,000.00)			-
15	3/25/10		306,166.79			(306,166.79)			-
16	3/25/10				10,000.00	(10,000.00)			-
17	4/20/10	52,500.00				(52,500.00)			-
18	4/20/10				5,000.00	(5,000.00)			-
19	6/14/10	25,000.00	(25,000.00)						-
20	6/28/10	20,000.00	(20,000.00)						-
21	6/28/10	20,000.00	(20,000.00)						-
22	8/5/10	30,000.00			(30,000.00)				-
23	8/12/10		(15,000.00)			15,000.00			-
24	8/17/10	11,450.00	(11,450.00)						-
25	8/18/10	50.00	(50.00)						-
26	8/18/10				(1,250,000.00)	1,250,000.00			-
27	8/19/10	200.00	(200.00)						-
28	8/20/10	100.00	(100.00)						-
29	8/23/10	850.00	(850.00)						-
30	8/26/10	50.00	(50.00)						-
31	8/30/10		464,736.50			(464,736.50)			-
32	8/30/10	30,000.00	(30,000.00)						-
33	9/24/10		160,000.00			(160,000.00)			-
34	12/29/10		(2,878.01)			2,878.01			-
35	12/31/10	400.00	(400.00)						-
36	1/3/11				(3,000.00)	3,000.00			-
37	1/3/11	50,000.00			(50,000.00)				-
38	1/11/11				(75,000.00)	75,000.00			-
39	2/7/11				(50,000.00)	50,000.00			-
40	2/7/11	900.00	(900.00)						-
41	2/11/11	20,000.00			(20,000.00)				-
42	2/23/11		(100,000.00)			100,000.00			-
43	2/23/11				(150,000.00)	150,000.00			-
44	2/23/11	20,000.00			(20,000.00)				-
45	2/28/11				(75,000.00)	75,000.00			-
46	3/14/11	900.00	(900.00)						-
47	3/15/11	40,000.00			(40,000.00)				-
48	3/17/11	(30,000.00)				30,000.00			-
49	4/20/11		(10,000.00)			10,000.00			-
50	4/20/11	45,000.00	(45,000.00)						-
51	5/6/11	10,000.00	(10,000.00)						-
52	6/9/11	3,850.00	(3,850.00)						-

Analysis of Chase Bank Accounts - Transfers Between Accounts

Exhibit 4-C

Time Period: January 2010 through January 2013

See Summary on page 3.

#	Date	SRD Personal Checking Acct **5365	SRD Personal Savings Acct **5678	SRD Personal Savings Acct **9890	Law Firm Account **0218	Ecuador Case Account **2758	DeLeon IOLA Trust Account **9822	IOLA Trust Account 2 **0989	Total
53	6/14/11	1,400.00	(1,400.00)						-
54	6/20/11	50.00	(50.00)						-
55	6/21/11	50,000.00			(50,000.00)				-
56	6/21/11		265,000.00		(265,000.00)				-
57	7/29/11	20,000.00	(20,000.00)						-
58	8/3/11	40,000.00	(40,000.00)						-
59	9/6/11	25,000.00			(25,000.00)				-
60	9/26/11	250.00	(250.00)						-
61	9/27/11	300.00	(300.00)						-
62	9/30/11	50,000.00			(50,000.00)				-
63	11/4/11	42,650.00	(42,650.00)						-
64	11/7/11	10,000.00			(10,000.00)				-
65	11/16/11	10,000.00			(10,000.00)				-
66	11/18/11		200,000.00		(200,000.00)				-
67	12/5/11	50,000.00			(50,000.00)				-
68	1/20/12	30,850.00	(30,850.00)						-
69	1/26/12	6,550.00	(6,550.00)						-
70	1/30/12	750.00	(750.00)						-
71	2/3/12	50.00	(50.00)						-
72	2/13/12	6,450.00	(6,450.00)						-
73	2/16/12	300.00	(300.00)						-
74	2/17/12	1,250.00	(1,250.00)						-
75	2/21/12	47,450.00	(47,450.00)						-
76	2/23/12	50.00	(50.00)						-
77	2/27/12	300.00	(300.00)						-
78	3/5/12	300.00	(300.00)						-
79	3/7/12	250.00	(250.00)						-
80	3/8/12	6,550.00	(6,550.00)						-
81	3/12/12	50.00	(50.00)						-
82	3/14/12	200.00	(200.00)						-
83	3/19/12	550.00	(550.00)						-
84	3/20/12	15,000.00	(15,000.00)						-
85	3/20/12	50,000.00			(50,000.00)				-
86	3/20/12		300,000.00		(300,000.00)				-
87	4/6/12	4,750.00	(4,750.00)						-
88	4/9/12	20,400.00	(20,400.00)						-
89	4/10/12	200.00	(200.00)						-
90	4/11/12	350.00	(350.00)						-
91	4/12/12	450.00	(450.00)						-
92	4/16/12	20,000.00			(20,000.00)				-
93	4/24/12	128,650.00	(128,650.00)						-
94	4/25/12	50.00	(50.00)						-
95	4/26/12	60,000.00			(60,000.00)				-
96	4/30/12	6,000.00	(6,000.00)						-
97	5/1/12	2,000.00	(2,000.00)						-
98	5/4/12	144.92				(144.92)			-
99	5/4/12	33,408.48					(33,408.48)		-
100	5/4/12	63,946.17						(63,946.17)	-
101	6/18/12	9,700.00	(9,700.00)						-
102	6/20/12	300.00	(300.00)						-
103	6/21/12	100.00	(100.00)						-
104	6/27/12	200.00	(200.00)						-

Analysis of Chase Bank Accounts - Transfers Between Accounts

Exhibit 4-C

Time Period: January 2010 through January 2013

See Summary on page 3.

#	Date	SRD Personal Checking Acct **5365	SRD Personal Savings Acct **5678	SRD Personal Savings Acct **9890	Law Firm Account **0218	Ecuador Case Account **2758	DeLeon IOLA Trust Account **9822	IOLA Trust Account 2 **0989	Total
105	6/29/12	5,250.00	(5,250.00)						-
106	7/2/12	150.00	(150.00)						-
107	7/6/12	200.00	(200.00)						-
108	7/11/12	50.00	(50.00)						-
109	7/13/12	7,250.00	(7,250.00)						-
110	7/16/12	100.00	(100.00)						-
111	7/17/12	50.00	(50.00)						-
112	7/19/12	36,100.00	(36,100.00)						-
113	7/31/12	40,000.00	(40,000.00)						-
114	9/4/12	46,995.14	(46,995.14)						-
115	9/5/12			400,000.00	(400,000.00)				-
116	10/9/12	20,000.00	(20,000.00)						-
117	10/24/12	2,700.00	(2,700.00)						-
118	10/26/12	350.00	(350.00)						-
119	10/29/12	6,600.00	(6,600.00)						-
120	10/31/12	250.00	(250.00)						-
121	11/2/12	12,650.00	(12,650.00)						-
122	11/9/12	50.00	(50.00)						-
123	11/13/12	350.00	(350.00)						-
124	11/14/12	300.00	(300.00)						-
125	11/19/12	350.00	(350.00)						-
126	11/20/12	300.00	(300.00)						-
Total Chase Only		\$1,406,144.71	\$780,780.14	\$356,100.00	(\$3,848,000.00)	\$1,402,329.80	(\$33,408.48)	(\$63,946.17)	\$0.00

Chase Accounts were closed in December 2012 and January 2013; all closing balance amounts were transferred to TD account **2265 Personal Checking.

127	12/3/12	(1,577.54)		(176,318.59)	(241,131.58)				(419,027.71)
128	1/7/13				(24,970.00)				(24,970.00)
Total Chase & TD		(\$1,577.54)	\$0.00	(\$176,318.59)	(\$266,101.58)	\$0.00	\$0.00	\$0.00	(\$443,997.71)

	SRD Personal Checking Acct **5365	SRD Personal Savings Acct **5678	SRD Personal Savings Acct **9890	Law Firm Account **0218	Ecuador Case Account **2758	DeLeon IOLA Trust Account **9822	IOLA Trust Account 2 **0989	All Accounts
Total In	\$1,436,144.71	\$1,695,903.29	\$400,000.00	\$55,000.00	\$2,410,878.01	\$0.00	\$0.00	\$5,997,926.01
Total Out	(\$30,000.00)	(\$915,123.15)	(\$43,900.00)	(\$3,903,000.00)	(\$1,008,548.21)	(\$33,408.48)	(\$63,946.17)	(\$5,997,926.01)
Net	\$1,406,144.71	\$780,780.14	\$356,100.00	(\$3,848,000.00)	\$1,402,329.80	(\$33,408.48)	(\$63,946.17)	\$0.00

SUMMARY		Transfers Between Accts		
Chase Accounts		In	Out	Net
Law Firm and IOLA Accounts		\$2,465,878.01	(\$5,008,902.86)	\$ (2,543,024.85)
Personal Savings Accounts		\$2,095,903.29	(\$959,023.15)	1,136,880.14
Personal Checking Accounts		\$1,436,144.71	(\$30,000.00)	1,406,144.71
TOTAL		\$ 5,997,926.01	\$ (5,997,926.01)	\$ -
Chase and TD Accounts		In	Out	Net
Law Firm and IOLA Accounts		\$2,465,878.01	(\$5,275,004.44)	\$ (2,809,126.43)
Personal Savings Accounts		\$2,095,903.29	(\$1,135,341.74)	960,561.55
Personal Checking Accounts		\$1,880,142.42	(\$31,577.54)	1,848,564.88
TOTAL		\$ 6,441,923.72	\$ (6,441,923.72)	\$ -

EXHIBIT 5-A

CHEVRON CORPORATION V. STEVEN DONZIGER, et al.

Analysis of Financial Transactions in the TD Bank Production**Exhibit 5-A****Payments Totals from Personal vs Business Accounts - Payees > \$1,000****Time Period: December 3, 2012 through June 30, 2018**

To (Payee)	Payments from...		Total
	Personal Accts.	Business Accts.	
American Express Total	\$ 717,773.89	\$ -	\$ 717,773.89
Laura Miller Total	264,523.65	135,000.00	399,523.65
Wells Fargo Home Mortgage Total	320,795.69	-	320,795.69 [1]
Keker & Van Nest Total	300,000.00	-	300,000.00
TD Bank - Credit Card Total	72,276.12	114,951.69	187,227.81
Friedman Rubin Total	150,000.00	-	150,000.00
Deepak Gupta Total	100,000.00	25,000.00	125,000.00
Aaron Page Total	82,000.00	40,000.00	122,000.00
Diplomat Security International Inc Total	84,000.00	-	84,000.00
CitiCards Total	62,479.95	-	62,479.95
UNK Total	56,354.70	-	56,354.70
Matthew D. Krack Total	53,884.69	-	53,884.69
Forum Nobis, PLLC Total	-	50,000.00	50,000.00
Frente De Defensa De La Amazonia Total	-	38,320.00	38,320.00
Meyers Saxon & Cole Total	15,750.00	15,750.00	31,500.00
Shuyana Natalia Yanza Allauca Total	13,000.00	17,600.00	30,600.00
The Gowen Group Total	28,000.00	-	28,000.00
The Hartford Life Insurance Company Total	26,330.90	-	26,330.90
The Weinberg Group, Inc. Total	25,000.00	-	25,000.00
Anton Tabuns Total	7,000.00	17,364.97	24,364.97
Charles Buchanan Total	23,000.00	-	23,000.00
Congregation Rodeph Sholom Total	22,361.00	-	22,361.00
Rapid West 102 Corp Total	17,471.52	-	17,471.52
Josh Rizack Total	12,566.33	-	12,566.33
CSR Wire Total	12,000.00	-	12,000.00
Fundacion Naupa de Saberes Andinos Total	9,000.00	3,000.00	12,000.00
Rex Weyler Total	-	10,900.97	10,900.97
Amazon Watch Total	10,000.00	-	10,000.00
Long Tuminello LLP Total	10,000.00	-	10,000.00
Pro Park Total	9,876.02	-	9,876.02
Big House Inc. Total	9,000.00	-	9,000.00
Veritext Total	8,456.22	-	8,456.22
Booth Media Group Inc Total	8,063.98	-	8,063.98

CHEVRON CORPORATION V. STEVEN DONZIGER, et al.

Analysis of Financial Transactions in the TD Bank Production**Exhibit 5-A****Payments Totals from Personal vs Business Accounts - Payees > \$1,000****Time Period: December 3, 2012 through June 30, 2018**

To (Payee)	Payments from...		Total
	Personal Accts.	Business Accts.	
Becker Gallagher Legal Publishing Total	7,572.12	-	7,572.12
Michael Frisch Total	7,500.00	-	7,500.00
The Culture Project Total	7,000.00	-	7,000.00
Luis Yanza Angamarca Total	4,800.00	2,000.00	6,800.00
Lyons Wier Gallery Total	6,551.50	-	6,551.50
Craig Longhiest Total	6,000.00	-	6,000.00
Gary Greenberg Total	6,000.00	-	6,000.00
Teri Gibney Total	5,500.00	-	5,500.00
Patricio Salazar Cordova Total	1,834.51	3,179.00	5,013.51
Christina Page Total	5,000.00	-	5,000.00
Gross Law Attorney Trust Total	-	5,000.00	5,000.00
3BI Media, LLC Total	-	4,600.00	4,600.00
Kevin Koenig Total	1,500.00	3,000.00	4,500.00
Suzanne Parish Total	4,000.00	-	4,000.00
Union De Afectados Por Texaco Total	4,000.00	-	4,000.00
Pachamama Alliance Total	3,484.11	-	3,484.11
David Zelman Total	3,000.00	-	3,000.00
Diane Noboa Total	3,000.00	-	3,000.00
GMG Tax Preparers Total	2,500.00	-	2,500.00
Dr. Bernard Kruger Total	2,335.00	-	2,335.00
US Bank N.A. Total	2,122.02	-	2,122.02
Ann Corbett Total	-	2,000.00	2,000.00
Michael R. D'Angelo Total	1,650.00	-	1,650.00
Camp Kenwood & Kenmont Total	1,500.00	-	1,500.00
Nicholas Crowley Total	1,467.52	-	1,467.52
Marco Vinicio Maldonado Guerrero Total	1,460.00	-	1,460.00
Anne Flicker Total	1,142.00	-	1,142.00
Karen Hinton Total	1,006.82	-	1,006.82
Grand Total	\$ 2,622,890.26	\$ 487,666.63	\$ 3,110,556.89

Note [1]: Returned payments were removed from the Wells Fargo Home Mortgage listing and total.

EXHIBIT 5-B

CHEVRON CORPORATION V. STEVEN DONZIGER, et al.

Analysis of Financial Transactions in the TD Bank Production**Exhibit 5-B****Payments Totals from Personal vs Business Accounts - Payees > \$1,000****Time Period: January 2016 - June 30, 2018**

To(Payee)	Payments from...		Total
	Personal Accts.	Business Accts.	
Laura Miller Total	\$ 212,000.00	\$ 135,000.00	\$ 347,000.00
TD Bank - Credit Card Total	72,276.12	114,951.69	187,227.81
American Express Total	163,831.73	-	163,831.73
Wells Fargo Home Mortgage Total	83,368.49	-	83,368.49 [1]
CitiCards Total	62,479.95	-	62,479.95
Forum Nobis Total	-	50,000.00	50,000.00
Aaron Page Total	5,000.00	40,000.00	45,000.00
Frente De Defensa De La Amazonia Total	-	38,320.00	38,320.00
Meyers Saxon & Cole Total	15,750.00	15,750.00	31,500.00
UNK Total	30,000.00	-	30,000.00
Shuyana Natalia Yanza Allauca Total	11,000.00	17,600.00	28,600.00
Deepak Gupta Total	-	25,000.00	25,000.00
Anton Tabuns Total	-	14,364.97	14,364.97
Josh Rizack Total	12,566.33	-	12,566.33
Fundacion Naupa de Saberes Andinos Total	9,000.00	3,000.00	12,000.00
Rex Weyler Total	-	10,900.97	10,900.97
Long Tuminello LLP Total	10,000.00	-	10,000.00
Pro Park Total	9,876.02	-	9,876.02
3BI Media, LLC Total	-	4,600.00	4,600.00
The Hartford Life Insurance Company Total	8,770.00	-	8,770.00
Becker Gallagher Legal Publishing Total	7,572.12	-	7,572.12
Michael Frisch Total	7,500.00	-	7,500.00
Craig Longhiest Total	6,000.00	-	6,000.00
Patricio Salazar Cordova Total	1,834.51	3,179.00	5,013.51
Suzanne Parish Total	4,000.00	-	4,000.00
Pachamama Alliance Total	3,484.11	-	3,484.11
Congregation Rodeph Sholom Total	3,361.00	-	3,361.00
David Zelman Total	3,000.00	-	3,000.00
Diane Noboa Total	3,000.00	-	3,000.00
Kevin Koenig Total	-	3,000.00	3,000.00
Dr. Bernard Kruger Total	2,335.00	-	2,335.00
Ann Corbett Total	-	2,000.00	2,000.00
Gary Greenberg Total	2,000.00	-	2,000.00
Camp Kenwood & Kenmont Total	1,500.00	-	1,500.00
Rapid West 102 Corp Total	1,342.12	-	1,342.12
Anne Flicker Total	1,142.00	-	1,142.00
Karen Hinton Total	1,006.82	-	1,006.82
Luis Yanza Angamarca Total	-	1,000.00	1,000.00
Subtotal - Payees >\$1,000	\$ 754,996.32	\$ 478,666.63	\$ 1,233,662.95
Subtotal - 151 Payees <\$1,000	\$ 107,405.62	\$ 1,960.00	\$ 109,365.62
Grand Total	\$ 862,401.94	\$ 480,626.63	\$ 1,343,028.57

Note [1]: Payments to Wells Fargo Home Mortgage that were subsequently returned were removed from this total.

EXHIBIT 5-C

CHEVRON CORPORATION V. STEVEN DONZIGER, et al.

Analysis of Financial Transactions in the TD Bank Production**Exhibit 5-C****Payments Totals from Personal vs Business Accounts - Payees > \$1,000****Time Period: December 3, 2012 through March 3, 2014 (RICO Judgment)**

To (Payee)	Payments from...		Total
	Personal Accts.	Business Accts.	
Keker & Van Nest Total	\$ 300,000.00	\$ -	\$ 300,000.00
American Express Total	278,229.15	-	278,229.15
Friedman Rubin Total	150,000.00	-	150,000.00
Deepak Gupta Total	100,000.00	-	100,000.00
Wells Fargo Home Mortgage Total	96,302.66	-	96,302.66
Diplomat Security International Inc Total	84,000.00	-	84,000.00
Aaron Page Total	70,000.00	-	70,000.00
Matthew D. Krack Total	53,884.69	-	53,884.69
Laura Miller Total	47,000.00	-	47,000.00
The Gowen Group Total	28,000.00	-	28,000.00
The Weinberg Group, Inc. Total	25,000.00	-	25,000.00
UNK Total	22,000.00	-	22,000.00
Charles Buchanan Total	20,000.00	-	20,000.00
Anton Tabuns Total	7,000.00	3,000.00	10,000.00
Amazon Watch Total	10,000.00	-	10,000.00
Big House Inc. Total	9,000.00	-	9,000.00
Veritext Total	8,456.22	-	8,456.22
Congregation Rodeph Sholom Total	8,400.00	-	8,400.00
The Culture Project Total	7,000.00	-	7,000.00
Lyons Wier Gallery Total	6,551.50	-	6,551.50
Christina Page Total	5,000.00	-	5,000.00
Gross Law Attorney Trust Total	-	5,000.00	5,000.00
The Hartford Life Insurance Company Total	4,390.00	-	4,390.00
Rapid West 102 Corp Total	3,403.28	-	3,403.28
US Bank N.A. Total	2,122.02	-	2,122.02
Michael R. D'Angelo Total	1,650.00	-	1,650.00
Gary Greenberg Total	1,500.00	-	1,500.00
Nicholas Crowley Total	1,467.52	-	1,467.52
GMG Tax Preparers Total	1,000.00	-	1,000.00
Grand Total	\$ 1,351,357.04	\$ 8,000.00	\$ 1,359,357.04

Note [1]: A 9/16/13 payment to Wells Fargo Home Mortgage that was subsequently returned was removed from this total.

EXHIBIT 6

Analysis of CWP Associates Bank Transactions (by Recipient Total in Descending Order)**Exhibit 6****Time Period: January 2018 through May 2018****MONTHLY ACCOUNT ACTIVITY**

	Deposits	Withdrawals	Net Activity
Dec-17	\$ 100.00	\$ -	\$ 100.00
Jan-18	750,020.00	200,188.00	549,832.00
Feb-18	-	49,540.69	(49,540.69)
Mar-18	-	131,861.66	(131,861.66)
Apr-18	-	12,107.99	(12,107.99)
May-18	-	356,421.66	(356,421.66)
Total [1]	\$ 750,120.00	\$ 750,120.00	\$ -

[1] Total Investor deposits equaled \$750,000.00. The remaining \$120.00 in deposits are related to an opening deposit of \$100.00 and wire transfer refunds of \$20.00.

Two payments made on May 3, 2018 to Forum Nobis, PPLC **\$ 342,045.16**

Three payments made between January 30 and March 13, 2018 to Donziger & Associates **\$ 125,000.00**

Bank Name	Name on Account	Account #	Date	From	To	Trans. Type	Withdrawals
Bank of America ("BofA")	Streamline DBA CWP Associates ("CWP Associates")	**9158	1/11/18	CWP Associates	Peter Grant Law Corp.	Wire Out	101,849.59
BofA	CWP Associates	**9158	1/17/18	CWP Associates	Peter Grant Law Corp.	Fx Out	4,732.12
Peter Grant Law Corp. Total							\$ 106,581.71
BofA	CWP Associates	**9158	3/9/18	CWP Associates	University of Calgary	Fx Out	19,993.60
BofA	CWP Associates	**9158	3/16/18	CWP Associates	University of Calgary	Fx Out	21,158.06
University of Calgary Total							\$ 41,151.66
BofA	CWP Associates	**9158	4/2/18	CWP Associates	American Express	Transfer Out	1,115.86
BofA	CWP Associates	**9158	4/16/18	CWP Associates	American Express	Transfer Out	10,992.13
BofA	CWP Associates	**9158	5/3/18	CWP Associates	American Express	Check	11,796.20
American Express Total							\$ 23,904.19
BofA	CWP Associates	**9158	2/20/18	CWP Associates	Anton Tabuns	Intl Out	20,000.00
Anton Tabuns Total							\$ 20,000.00

Chevron Corporation v. Steven Donziger, et al.

Analysis of CWP Associates Bank Transactions (by Recipient Total in Descending Order)**Exhibit 6****Time Period: January 2018 through May 2018**

Bank Name	Name on Account	Account #	Date	From	To	Trans. Type	Withdrawals
BofA	CWP Associates	**9158	1/12/18	CWP Associates	Forum Nobis, PLLC	Wire Out	10,000.00
BofA	CWP Associates	**9158	3/14/18	CWP Associates	Forum Nobis, PLLC	Transfer Out	7,500.00
Forum Nobis, PLLC Total							\$ 17,500.00
BofA	CWP Associates	**9158	1/17/18	CWP Associates	Fundacion Naupa	Intl Out	15,286.75
BofA	CWP Associates	**9158	3/30/18	CWP Associates	Fundacion Naupa	Intl Out	2,000.00
Fundacion Naupa Total							\$ 17,286.75
BofA	CWP Associates	**9158	1/12/18	CWP Associates	Frente De Defensa De La Am	Intl Out	13,100.00
Frente De Defensa De La Am Total							\$ 13,100.00
BofA	CWP Associates	**9158	1/17/18	CWP Associates	Rex Weyler	Fx Out	7,852.51
Rex Weyler Total							\$ 7,852.51
BofA	CWP Associates	**9158	1/11/18	CWP Associates	Independent Media	Transfer Out	5,000.00
Independent Media Total							\$ 5,000.00
BofA	CWP Associates	**9158	3/14/18	CWP Associates	Simon Billenness	Transfer Out	5,000.00
Simon Billenness Total							\$ 5,000.00
BofA	CWP Associates	**9158	1/18/18	CWP Associates	N/N	Check	3,622.21
BofA	CWP Associates	**9158	1/23/18	CWP Associates	N/N	Check	1,143.00
N/N Total							\$ 4,765.21
BofA	CWP Associates	**9158	1/16/18	CWP Associates	Patricio Salazar Cordova	Wire Out	4,642.74
Patricio Salazar Cordova Total							\$ 4,642.74
BofA	CWP Associates	**9158	2/6/18	CWP Associates	Hinton Communications	Check	4,485.69
Hinton Communications Total							\$ 4,485.69
BofA	CWP Associates	**9158	1/17/18	CWP Associates	First Nations Summit Society	Fx Out	3,775.01
First Nations Summit Society Total							\$ 3,775.01
BofA	CWP Associates	**9158	5/3/18	CWP Associates	Katie Sullivan	Cashier's Check	2,580.30
Katie Sullivan Total							\$ 2,580.30
BofA	CWP Associates	**9158	1/24/18	CWP Associates	Waddell Phillips Profession.	Fx Out	2,220.07
Waddell Phillips Profession. Total							\$ 2,220.07

Chevron Corporation v. Steven Donziger, et al.

Analysis of CWP Associates Bank Transactions (by Recipient Total in Descending Order)**Exhibit 6****Time Period: January 2018 through May 2018**

Bank Name	Name on Account	Account #	Date	From	To	Trans. Type	Withdrawals
BofA	CWP Associates	**9158	1/17/18	CWP Associates	Uyunkar Doming Peas Nampic	Intl Out	1,365.00
Uyunkar Doming Peas Nampic Total							\$ 1,365.00
BofA	CWP Associates	**9158	3/19/18	CWP Associates	Shuyana Natalia Alluaca	Intl Out	1,000.00
Shuyana Natalia Alluaca Total							\$ 1,000.00
BofA	CWP Associates	**9158	1/11/18	CWP Associates	Bank of America	Wire Transfer Fee	35.00
BofA	CWP Associates	**9158	1/11/18	CWP Associates	Bank of America	Fee	99.00
BofA	CWP Associates	**9158	1/12/18	CWP Associates	Bank of America	Extrnl. Trans. Fee	10.00
BofA	CWP Associates	**9158	1/12/18	CWP Associates	Bank of America	Wire Transfer Fee	30.00
BofA	CWP Associates	**9158	1/12/18	CWP Associates	Bank of America	Wire Transfer Fee	45.00
BofA	CWP Associates	**9158	1/16/18	CWP Associates	Bank of America	Wire Transfer Fee	30.00
BofA	CWP Associates	**9158	1/17/18	CWP Associates	Bank of America	Wire Transfer Fee	35.00
BofA	CWP Associates	**9158	1/17/18	CWP Associates	Bank of America	Wire Transfer Fee	35.00
BofA	CWP Associates	**9158	1/17/18	CWP Associates	Bank of America	Wire Transfer Fee	35.00
BofA	CWP Associates	**9158	1/17/18	CWP Associates	Bank of America	Wire Transfer Fee	45.00
BofA	CWP Associates	**9158	1/17/18	CWP Associates	Bank of America	Wire Transfer Fee	45.00
BofA	CWP Associates	**9158	1/24/18	CWP Associates	Bank of America	Wire Transfer Fee	30.00
BofA	CWP Associates	**9158	1/24/18	CWP Associates	Bank of America	Wire Transfer Fee	35.00
BofA	CWP Associates	**9158	1/26/18	CWP Associates	Bank of America	Wire Transfer Fee	30.00
BofA	CWP Associates	**9158	1/29/18	CWP Associates	Bank of America	Wire Transfer Fee	30.00
BofA	CWP Associates	**9158	1/30/18	CWP Associates	Bank of America	Wire Transfer Fee	30.00
BofA	CWP Associates	**9158	2/5/18	CWP Associates	Bank of America	Extrnl. Trans. Fee	10.00
BofA	CWP Associates	**9158	2/20/18	CWP Associates	Bank of America	Wire Transfer Fee	45.00
BofA	CWP Associates	**9158	3/9/18	CWP Associates	Bank of America	Wire Transfer Fee	35.00
BofA	CWP Associates	**9158	3/13/18	CWP Associates	Bank of America	Wire Transfer Fee	10.00
BofA	CWP Associates	**9158	3/15/18	CWP Associates	Bank of America	Extrnl. Trans. Fee	5.00
BofA	CWP Associates	**9158	3/15/18	CWP Associates	Bank of America	Extrnl. Trans. Fee	5.00
BofA	CWP Associates	**9158	3/16/18	CWP Associates	Bank of America	Wire Transfer Fee	15.00
BofA	CWP Associates	**9158	3/19/18	CWP Associates	Bank of America	Wire Transfer Fee	10.00
BofA	CWP Associates	**9158	3/30/18	CWP Associates	Bank of America	Wire Transfer Fee	10.00
Bank of America Total							\$ 744.00
Grand Total							\$ 282,954.84

EXHIBIT 7-A

Chevron Corporation v. Steven Donziger, et al.

Summary of TD Bank Visa & American Express Credit Card Expenses - Top 50 Payees
Time Period: January 2016 through June 30, 2018**Exhibit 7-A**

#	Payee Name	American Express	TD Bank Visa Card	Total
1	American Airlines	12,123.08	9,835.78	\$ 21,958.86
2	Gym Precision	780.00	13,260.00	14,040.00
3	Avianca Ecuador	6,586.70	6,551.38	13,138.08
4	Room & Board	12,890.79	-	12,890.79
5	Delta Airlines	10,516.18	1,681.15	12,197.33
6	3BL Media LLC	-	11,705.00	11,705.00
7	AT&T	2,910.70	6,477.93	9,388.63
8	Browns Hotel	-	9,371.17	9,371.17
9	TAP Air Internet	6,895.92	-	6,895.92
10	Precision Athlete	6,340.00	-	6,340.00
11	United Airlines	653.09	5,037.10	5,690.19
12	Air Canada	4,061.05	1,536.92	5,597.97
13	Walkers	2,341.11	2,884.61	5,225.72
14	Time Warner Cable	2,484.69	2,406.29	4,890.98
15	Hotel Tonight	1,239.36	3,489.89	4,729.25
16	JetBlue	233.10	4,286.50	4,519.60
17	Thompson Hotel	3,673.56	375.53	4,049.09
18	Charles Hotel	2,412.35	1,633.74	4,046.09
19	Nylo Hotel	312.17	3,452.11	3,764.28
20	Intuit	3,762.03	-	3,762.03
21	Henry's Restaurant	1,894.47	1,761.23	3,655.70
22	Limelight Hotel	-	3,452.04	3,452.04
23	Sfoglia	1,863.74	1,586.12	3,449.86
24	Vila Vita Parc	3,273.59	-	3,273.59
25	British Airways	-	3,155.90	3,155.90
26	Norwegian Air	-	3,135.60	3,135.60
27	Le Compagnie	-	3,058.42	3,058.42
28	Club Med	2,865.46	134.20	2,999.66
29	Tap Portugal	2,770.00	-	2,770.00
30	NYC Taxi	1,054.82	1,712.09	2,766.91
31	Intercontinental Hotels	1,484.20	1,238.84	2,723.04
32	Hotels.com	769.39	1,913.05	2,682.44
33	Acme Fine Wines	-	2,578.00	2,578.00
34	Fairmont Hotels	1,693.56	876.14	2,569.70
35	Hotel Bachaumont	-	2,567.44	2,567.44
36	The White Hart Inn	162.36	2,157.24	2,319.60
37	Appeal Tech	172.02	2,085.39	2,257.41
38	Olissipo Lapa Palace	2,249.43	-	2,249.43
39	CarmelLimoPass.com	1,221.40	986.10	2,207.50
40	The Red Cat	1,310.94	887.53	2,198.47
41	Westin Hotels	266.72	1,913.89	2,180.61
42	Hotel Quito	-	2,103.81	2,103.81
43	Dinahs Garden Hotel	2,100.57	-	2,100.57
44	CVS	2,062.96	13.27	2,076.23
45	Omni Hotel	2,011.54	37.45	2,048.99
46	Amtrak	1,341.00	657.00	1,998.00
47	Apple	1,825.26	153.25	1,978.51
48	Hillstone	463.00	1,359.47	1,822.47
49	Jean Georges	152.38	1,664.26	1,816.64
50	New York City MTA	680.00	1,097.10	1,777.10
Subtotal - Top 50 Entities		\$ 113,904.69	\$ 126,269.93	\$ 240,174.62
Subtotal - 603 Remaining Entities		75,214.50	60,644.17	135,858.67
Total Charges		\$ 189,119.19	\$ 186,914.10	\$ 376,033.29

EXHIBIT 7-B

Chevron Corporation v. Steven Donziger, et al.

Summary of TD Bank Visa & American Express Credit Card Expenses & Related Payments by Month & Card User**Exhibit 7-B****Time Period: January 2016 through June 30, 2018**

Period	American Express				TD Bank Visa	Amex & TD	Payments on Credit Cards from...			
	L. Miller	M. Sullivan	Donziger	Total	Donziger	Combined Total	Donziger Personal TD	Donziger Business TD	CWP and Streamline [2]	Total
Jan-16	1,546.13	-	5,350.17	6,896.30	-	6,896.30	19,139.64	-	-	19,139.64
Feb-16	4,816.36	-	5,575.59	10,391.95	-	10,391.95	6,857.59	-	-	6,857.59
Mar-16	17,806.03	-	8,051.53	25,857.56	-	25,857.56	7,168.60	-	-	7,168.60
Apr-16	4,155.71	-	13,551.64	17,707.35	-	17,707.35	14,495.36	-	-	14,495.36
May-16	4,207.86	-	9,108.33	13,316.19	-	13,316.19	22,984.19	-	-	22,984.19
Jun-16	1,805.60	-	14,253.77	16,059.37	-	16,059.37	20,432.55	-	-	20,432.55
Jul-16	1,829.11	-	16,343.05	18,172.16	-	18,172.16	8,844.43	-	-	8,844.43
Aug-16	15,991.23	-	11,449.40	27,440.63	-	27,440.63	5,832.59	-	-	5,832.59
Sep-16	1,878.98	-	13,633.21	15,512.19	-	15,512.19	28,340.23	-	-	28,340.23
Oct-16	-	-	-	-	12,065.32	12,065.32	30,443.39	-	-	30,443.39
Nov-16	-	-	-	-	14,444.04	14,444.04	-	9,173.47	-	9,173.47
Dec-16	-	-	-	-	9,242.06	9,242.06	10,012.35	14,222.00	-	24,234.35
Subtotal - 2016	\$ 54,037.01	\$ -	\$ 97,316.69	\$ 151,353.70	\$ 35,751.42	\$ 187,105.12	\$ 174,550.92	\$ 23,395.47	\$ -	\$ 197,946.39
Jan-17	-	-	-	-	7,731.96	7,731.96	-	-	-	-
Feb-17	-	-	-	-	10,698.62	10,698.62	17,728.73	-	-	17,728.73
Mar-17	-	-	-	-	6,957.15	6,957.15	-	10,445.74	-	10,445.74
Apr-17	-	-	-	-	13,432.21	13,432.21	-	11,297.46	-	11,297.46
May-17	-	-	-	-	11,143.54	11,143.54	-	9,587.71	-	9,587.71
Jun-17	-	-	-	-	7,270.76	7,270.76	-	8,198.50	-	8,198.50
Jul-17	-	-	-	-	9,764.36	9,764.36	-	-	-	-
Aug-17	-	-	-	-	3,922.96	3,922.96	-	13,008.74	-	13,008.74
Sep-17	-	-	-	-	16,284.32	16,284.32	-	9,725.00	-	9,725.00
Oct-17	-	-	-	-	11,161.03	11,161.03	14,725.62	-	-	14,725.62
Nov-17	-	-	-	-	3,477.15	3,477.15	-	6,313.00	-	6,313.00
Dec-17	-	-	-	-	9,669.84	9,669.84	6,119.00	-	-	6,119.00
Subtotal - 2017	\$ -	\$ -	\$ -	\$ -	\$ 111,513.90	\$ 111,513.90	\$ 38,573.35	\$ 68,576.15	\$ -	\$ 107,149.50
Jan-18	-	4,306.84	-	4,306.84	14,996.82	19,303.66	9,850.00	-	-	9,850.00
Feb-18	-	1,733.36	220.06	1,953.42	12,259.43	14,212.85	-	10,655.00	4,492.75	15,147.75
Mar-18	-	2,735.71	1,974.16	4,709.87	8,682.29	13,392.16	-	12,325.07	-	12,325.07
Apr-18	-	109.85	21,043.73	21,153.58	393.46	21,547.04	9,256.15	-	16,284.30	25,540.45
May-18	-	1,148.97	247.74	1,396.71	2,842.10	4,238.81	-	-	11,796.20	11,796.20
Jun-18	-	4,445.07	(200.00)	4,245.07	474.68	4,719.75	3,620.43	-	3,548.35	7,168.78
Subtotal - 2018	\$ -	\$ 14,479.80	\$ 23,285.69	\$ 37,765.49	\$ 39,648.78	\$ 77,414.27	\$ 22,726.58	\$ 22,980.07	\$ 36,121.60	\$ 81,828.25
Total [1]	\$ 54,037.01	\$ 14,479.80	\$ 120,602.38	\$ 189,119.19	\$ 186,914.10	\$ 376,033.29	\$ 235,850.85	\$ 114,951.69	\$ 36,121.60	\$ 386,924.14

[1] As shown above, Donziger switched from an American Express credit card to a TD Bank credit card in October 2016. Donziger began using American Express again in February 2018,.

[2] Kroll notes that CWP and Streamline both made payments towards the American Express charges.

EXHIBIT 8

Disposition of Investor Payments - Summary of Payees With Totals Greater than \$1,000

Exhibit 8

Payment Totals from SRD Personal, SRD Law Firm, CWP, and Streamline Bank Accounts

Time Period: January 2016 through June 2018

To (Payee)	Payments from SRD...		Payments from...		Amount
	Personal Accts.	Law Firm Accts.	CWP/Streamline		
Laura Miller Total	\$ (162,000.00)	\$ (135,000.00)	\$ -	\$	(297,000.00)
TD Bank Total	(43,525.20)	(116,496.69)	-		(160,021.89)
Peter Grant Law Corp. Total	-	-	(106,581.71)		(106,581.71)
American Express Total	(63,936.39)	-	(23,904.19)		(87,840.58)
CitiCard Total	(82,250.65)	-	-		(82,250.65)
Forum Nobis, PLLC Total	-	(50,000.00)	(17,500.00)		(67,500.00)
Wells Fargo Mortgage Total	(64,159.16)	-	-		(64,159.16)
Frente De Defensa De La Amazonia Total	-	(38,320.00)	(13,100.00)		(51,420.00)
Aaron Marr Page Total	(5,000.00)	(40,000.00)	-		(45,000.00)
University of Calgary Total	-	-	(41,151.66)		(41,151.66)
Anton Tabuns Total	-	(14,364.97)	(20,000.00)		(34,364.97)
Fundacion Naupa de Saberes Andinos Total	(5,000.00)	(3,000.00)	(17,286.75)		(25,286.75)
Deepak Gupta Total	-	(25,000.00)	-		(25,000.00)
Rex Weyler Total	-	(10,900.97)	(7,852.51)		(18,753.48)
Steven R. Donziger Total	(17,238.12)	-	-		(17,238.12)
Shuyana Yanza Total	(5,000.00)	(11,100.00)	-		(16,100.00)
Meyers Saxon & Cole Total	-	(15,750.00)	-		(15,750.00)
Long Tuminello LLP Total	(10,000.00)	-	-		(10,000.00)
Patricio Salazar Cordova Total	(1,834.51)	(3,179.00)	(4,642.74)		(9,656.25)
Unknown Total	(150.00)	-	(9,250.90)		(9,400.90)
Pro Park Total	(8,573.90)	-	-		(8,573.90)
Becker Gallagher Legal Publishing Total	(7,572.12)	-	-		(7,572.12)
Craig Longhurst Total	(6,000.00)	-	-		(6,000.00)
Independent Media Total	-	-	(5,000.00)		(5,000.00)
Simon Billenness Total	-	-	(5,000.00)		(5,000.00)
Other Payees Total	(4,957.23)	-	-		(4,957.23)
3BL Media LLC Total	-	(4,600.00)	-		(4,600.00)
Hartford Life Insurance Total	(4,390.00)	-	-		(4,390.00)
Suzanne Parish Total	(4,000.00)	-	-		(4,000.00)
First Nations Summit Society Total	-	-	(3,775.01)		(3,775.01)
Michael Frisch Total	(3,750.00)	-	-		(3,750.00)
Hotel Tonight Total	(3,585.00)	-	-		(3,585.00)
Congregation Rodeph Sholom Total	(3,469.00)	-	-		(3,469.00)
David Zelman Total	(3,000.00)	-	-		(3,000.00)
Diane Noboa Total	(3,000.00)	-	-		(3,000.00)
Kevin Koenig Total	-	(3,000.00)	-		(3,000.00)
Katie Sullivan Total	-	-	(2,580.30)		(2,580.30)
Waddell Phillips Profession. Total	-	-	(2,220.07)		(2,220.07)
Andrea Flicker Total	(2,033.00)	-	-		(2,033.00)
Ann Corbett Total	-	(2,000.00)	-		(2,000.00)
CON ED of NY Total	(1,862.78)	-	-		(1,862.78)
Gary Ruth DDS Total	(1,500.00)	-	-		(1,500.00)
State Farm Total	(1,418.42)	-	-		(1,418.42)
Uyunkar Doming Peas Nampic Total	-	-	(1,365.00)		(1,365.00)
Rapid Park Total	(1,342.12)	-	-		(1,342.12)
ShopSCAD Total	(1,060.00)	-	-		(1,060.00)
Gary Greenberg Total	(1,000.00)	-	-		(1,000.00)
Shuyana Natalia Alluaca Total	-	-	(1,000.00)		(1,000.00)
Subtotal - 48 Payees With Totals \$1,000 or Greater	\$ (522,607.60)	\$ (472,711.63)	\$ (282,210.84)	\$	(1,277,530.07)
Subtotal - 87 Payees With Totals Less Than \$1,000	\$ (16,746.31)	\$ -	\$ (744.00)	\$	(17,490.31)
Grand Total [1]	\$ (539,353.91)	\$ (472,711.63)	\$ (282,954.84)	\$	(1,295,020.38)
Total Investor Payments Traced to TD and CWP Accounts	\$ 1,012,065.54	\$ 282,954.84	\$ 1,295,020.38		
Note [1]: Payments from the TD accounts equal 81.4% of related Investor deposits.	\$ 1,242,985.16	Total Investor Deposits	\$ 1,525,940.00		

EXHIBIT 9

Chevron Corporation v. Steven Donziger, et al.

Comparison of Known Investment at RICO Judgment and as of September 26, 2018**Exhibit 9****Time Period: August 2004 through January 2018**

Name	Known Investment Commitments as of 3/4/14 [1]	Known Investment Commitments as of 9/26/18	Known Investment as of 3/4/14 [1]	Known Investment as of 9/26/18	
Kohn Swift & Graf, P.C.	\$6,360,647	\$6,360,647	\$6,360,647	\$6,360,647	
Russell DeLeon	2,000,000	1,500,000	1,500,000	1,500,000	
Orin Kramer	150,000	150,000	150,000	150,000	
Torvia Limited	7,250,000	20,677,281	3,413,367	3,747,367	
Burford	15,000,000	4,000,000	4,000,000	4,000,000	
88 Capital	250,000	250,000			
Equitable Outcomes	150,000	150,000			
Jonaks Limited	200,000	200,000			
Satee GMBH	300,000	300,000			
David Sherman III	250,000	250,000			
Russell O. Wiese	50,000	50,000			
Michael Donziger	150,000	150,000		100,000	[2]
TC Payment Services International			424,948	424,948	
Amazonia Recovery Limited			149,000	194,000	
Temeraire Limited		2,500,000			
Olswang LLP (Woodsford)				200,000	[2]
Glenn Krevlin	250,000	850,000		600,000	[3]
Cliff Eisler		250,000		250,000	[3]
Indigenous People Limited (Ian Watson)		250,000		250,000	[3]
WDIS Finance LLC (JV Merkensteijn)		400,000		400,000	[3]
Fenwick (George Roger Waters)		202,000		202,000	[3]
Wellbeck Partner LLC (Jay Goldstein)		200,000		200,000	[3]
CHV LLV (Tony Abbiati & Client)		500,000		500,000	[3]
Totals	\$32,360,647	\$39,189,928	\$15,997,962	\$19,078,962	

Notes:

[1] - Agrees with PX 2143 from the October 8, 2013 Direct Testimony of Troy A. Dahlberg (PX 4900).

[2] - Known Investment as of 9/26/18 agrees to Summary of Investor Deposits on **Exhibit 3-B**.[3] - Known Investment as of 9/26/18 agrees to Investment Agreement Amounts on **Exhibit 2**.